

1 SIGAL CHATTAH  
United States Attorney  
2 District of Nevada  
Nevada Bar Number 8264  
3 MELANEE SMITH  
STEVEN J. ROSE  
4 Nevada Bar Number 13575  
Assistant United States Attorneys  
5 501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
6 (702) 388-6336  
[Melanee.Smith@usdoj.gov](mailto:Melanee.Smith@usdoj.gov)  
7 [Steven.Rose@usdoj.gov](mailto:Steven.Rose@usdoj.gov)

8 DAVID L. JAFFE  
Chief, Violent Crime and Racketeering Section  
9 U.S. Department of Justice  
JUSTIN BISH  
10 CHRISTOPHER O. TAYLOR  
Trial Attorneys  
11 Violent Crime and Racketeering Section  
U.S. Department of Justice  
12 [Justin.Bish@usdoj.gov](mailto:Justin.Bish@usdoj.gov)  
[Christopher.Taylor2@usdoj.gov](mailto:Christopher.Taylor2@usdoj.gov)  
13 *Attorneys for the United States*

14 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 JOSE LUIS REYNALDO REYES-CASTILLO,  
a/k/a "Molesto,"  
19 DAVID ARTURO PEREZ-MANCHAME,  
a/k/a "Walter Melendez,"  
a/k/a "Herbi," a/k/a "Catracho,"  
20 JOEL VARGAS-ESCOBAR,  
a/k/a "Momia," and  
21 ALEXANDER DE JESUS FIGUEROA-  
TORRES,  
22  
23 Defendants.  
24

Case No. 2:19-cr-00103-GMN-MDC

**Government's Emergency Motion for  
a Status Conference**

1 The United States, by and through the undersigned, respectfully moves this Court to set  
2 a status conference as soon as practicable to address the current trial date. Trial is currently set  
3 for April 21, 2025. The trial date was set with the agreement of the Court, the government, and  
4 three of the four charged defendants, excluding defendant Joel Vargas-Escobar. On April 1,  
5 2025, defendant Joel Vargas-Escobar was taken into federal custody and must be joined for trial  
6 with his co-defendants.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

## I. Relevant Background and Procedural Posture

9 On March 2, 2018, defendants Jose Luis Reynaldo Reyes-Castillo (“Reyes-Castillo”)  
10 and David Arturo Perez-Manchame (“Perez-Manchame”) were arrested by the Las Vegas  
11 Metropolitan Police Department. They have remained in continuous custody since that date.<sup>1</sup>  
12 On April 30, 2019, a federal grand jury sitting in the District of Nevada returned an indictment  
13 charging Reyes-Castillo and Perez-Manchame with Murder in Aid of Racketeering in violation  
14 of 18 U.S.C. § 1959(a)(1) and related crimes. On August 4, 2021, a superseding indictment was  
15 filed charging Reyes-Castillo, Perez-Manchame, Joel Vargas-Escobar (“Vargas-Escobar”), and  
16 Alexander de Jesus Figueroa-Torres (“Figueroa-Torres”) with RICO Conspiracy in violation of  
17 18 U.S.C. § 1962(d), Murder in Aid of Racketeering in violation of 18 U.S.C. § 1959(a)(1), and  
18 related crimes. On the same date the superseding indictment was filed, arrest warrants were  
19 issued for Vargas-Escobar and Figueroa-Torres but their whereabouts were unknown.<sup>2</sup> In  
20 January 2024, Figueroa-Torres voluntarily reentered the United States and was arrested in the

<sup>22</sup> 23 <sup>1</sup> Reyes-Castillo and Perez-Manchame were initially held on immigration related crimes. As discussed *infra*, they were later transferred to federal custody after being indicted on federal RICO charges.

<sup>24</sup> Both Vargas-Escobar and Figueroa-Torres had been deported to El Salvador prior to the superseding indictment being filed.

1 Southern District of Texas on immigration related charges. In February 2024, Figueroa-Torres  
2 was transferred to the District of Nevada pursuant to the arrest warrant that was issued on  
3 August 4, 2021. He has remained in continuous federal custody since his arrest.

4 On June 26, 2024, a second superseding indictment was filed containing the same  
5 charges for each defendant as the first superseding indictment but added additional overt acts to  
6 Count One, RICO Conspiracy. On February 25, 2025, a third superseding indictment was filed  
7 containing the same charges for each defendant as the first and second superseding indictments  
8 but added additional overt acts to Count One. On the same date the third superseding  
9 indictment was filed, an arrest warrant was issued for Joel Vargas-Escobar. On April 1, 2025,  
10 Vargas-Escobar was arrested by the Federal Bureau of Investigation (FBI) in Westbury, New  
11 York. He made his initial appearance in the Eastern District of New York on April 2, 2025, and  
12 was ordered to be transferred to the District of Nevada pursuant to the arrest warrant issued on  
13 February 25, 2025.

14 **II. Legal Standard**

15 Under the Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, co-defendants must be joined for  
16 trial. *See* 18 U.S.C. § 3161(h)(6). The legislative history of Section 3161(h)(6) “demonstrates a  
17 strong Congressional preference for joint trials” and “that the Speedy Trial Act does not alter  
18 the present rules governing severance of co-defendants by forcing the government to prosecute  
19 defendants separately. Congress thus explicitly recognized the utility of multi-defendant trials to  
20 effectuate the prompt efficient disposition of criminal justice...” *United States v. Culpepper*, 898  
21 F.2d 65, 68 (6th Cir. 1990). Further, the trial of a defendant “shall not commence less than  
22 thirty days from the date on which the defendant first appears through counsel...” *See*  
23 18 U.S.C. § 3161(c)(2).

### III. Argument

The current trial setting of April 21, 2025, was set by the Court while Vargas-Escobar was a fugitive. However, Vargas-Escobar is now in custody and has made an appearance before a federal magistrate judge. He has been ordered to be transferred to the District of Nevada and will arrive in this district prior to April 21, 2025. Pursuant to 18 U.S.C. § 3161(h)(6) he must be joined for trial with his co-defendants. Given the short time between his expected arrival in the District of Nevada and the current trial setting, it is unrealistic that he will be ready to proceed to trial on April 21. Further, unless he consents in writing trial may not commence within 30 days of his first appearance. Given the complexities and expected duration of this multi-defendant trial, and that filing deadlines are quickly approaching, the government respectfully requests the Court to set this matter for a status conference as soon as practicable to determine how to proceed.

DATED: April 2, 2025

SIGAL CHATTAH  
United States Attorney

*/s/ Melanee Smith*  
*/s/ Steven Rose*  
MELANEE SMITH  
STEVEN ROSE  
Assistant U.S. Attorneys

DAVID L. JAFFE  
Chief, Violent Crime and Racketeering Section

*/s/ Justin Bish*  
*/s/ Christopher Taylor*  
\_\_\_\_\_  
JUSTIN BISH  
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